

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

D.E.H.,  
Plaintiff  
v.

No. 25-11260

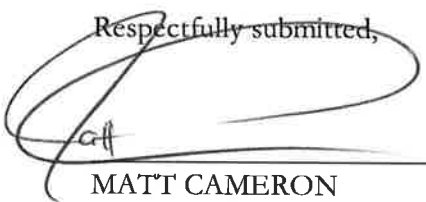
PATRICIA HYDE, ICE New England Field Office Director,  
TODD LYONS, Director of ICE  
MARCO RUBIO, Secretary of State  
KRISTI NOEM, Secretary of Homeland Security,  
Defendants

**PETITIONER'S MOTION TO DISMISS**

**Petitioner D.E.H. moves that this Court dismiss his petition, terminate the pending Temporary Restraining Order, and otherwise close this matter at the Court's earliest convenience.**

In support of this Motion, Petitioner no longer wishes to challenge his removal from the United States. Undersigned Counsel has attached an affidavit confirming the basis for this Motion. Petitioner now requests that the Temporary Restraining Order previously issued in this matter be lifted and the entire matter dismissed at the court's earliest convenience.

Respectfully submitted,

  
MATT CAMERON  
Cameron Micheroni & Silvia  
50 Congress St #314  
Boston, Mass. 02109

6/16/2025

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**AFFIDAVIT OF COUNSEL**

- 1) My name is Matt Cameron. I am counsel of record *pro bono* in the above-captioned *habeas* matter.
- 2) I have personally spoken with my client as of the date of this filing and he has confirmed that he wishes to have this matter dismissed so that he may
- 3) I have advised my client that under current ICE practices, he could be subjected to removal to a third country once the TRO previously issued in this matter is lifted. He reserves his right to challenge removal to any country other than Venezuela.
- 4) My client has requested that I file this Motion as quickly as possible today so that his removal to Venezuela may be effectuated as soon as possible, and I doing so now at the earliest opportunity.
- 5) I do not anticipate any objection from government counsel given the government's stated position that it wishes to carry out expedited removal as soon as possible.

I declare under pains and penalties of perjury that the foregoing is true and correct. Executed this 16<sup>th</sup> of June, 2025,

  
MATT CAMERON

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KRISTI NOEM, Secretary of Homeland Security,	)	
Defendants	)	

**CERTIFICATE OF SERVICE**

I certify that this document has been filed with the clerk of the court and served by ECF or email on ~~May 8, 2025~~ upon counsel of record in the underlying litigation.

6/16/25

